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CORPORATION
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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12 NEELAM SANDHU, an individual,

13 Plaintiff,

14 vs.

15 BLACKBERRY CORPORATION, a
Delaware Corporation,

16 Defendant.

Case No. 3:24-cv-02002-SK

**DECLARATION OF JENNIFER
BRAMHILL IN SUPPORT OF
DEFENDANT BLACKBERRY
CORPORATION'S MOTION FOR
SUMMARY JUDGMENT**

Judge:

Hon. Sallie Kim

1 positions held by Neelam Sandhu (Chief of Staff to BlackBerry's CEO, Chief Elite Customer
2 Success Officer, Chief Marketing Officer, and Senior Vice President, Sustainability) reported
3 directly to BlackBerry's CEO and were not part of either the Cyber or the IoT business units. From
4 2014 through November 3, 2023, Neelam Sandhu's sole supervisor was BlackBerry's CEO, John
5 Chen. From November 4, 2023 to December 10, 2023, Neelam Sandhu's sole supervisor was
6 BlackBerry's Interim CEO, Richard Lynch. At no point before her notice of termination on
7 December 4, 2023, was Neelam Sandhu supervised by Phil Kurtz, Tim Foote, John Giamatteo, or
8 Hans-Peter Bauer.

9 7. Between November 2023 and December 2024, BlackBerry involuntarily terminated
10 and eliminated the positions of approximately 550 employees in total. Over 150 of the roles
11 BlackBerry eliminated between November 2023 and December 2024 were in the company's
12 corporate layer, separate from its IoT and Cyber business units.

13 8. As of December 2025, BlackBerry currently has approximately 1,736 employees.

14 9. The roles and titles held by Neelam Sandhu at the time of her termination—Chief
15 Marketing Officer and Chief Elite Customer Success Officer—have not existed at BlackBerry since
16 Ms. Sandhu's departure in December 2023.

17 10. Marketing functions since December 18, 2023 have been handled by individuals
18 within the QNX (formerly IoT) and Secure Communications (formerly Cyber) business units. As
19 part of the same restructuring that eliminated the Chief Marketing Officer role, 26 corporate
20 marketing employees were given new roles in the Cyber or IoT business units and ten corporate
21 marketing roles (in addition to CMO) were eliminated.

22 11. The Elite Customer Success Team—which had eight employees as of 2023—was
23 disbanded and permanently eliminated as part of the same restructuring that eliminated the Elite
24 Customer Success Officer role. As part of that restructuring, four Elite team employees were given
25 new roles in the Cyber business unit, one employee was transferred to the Corporate Government
26 Affairs and Public Policy Team, and three roles were eliminated. (The employee who transferred
27 to the Corporate Government Affairs and Public Policy Team moved into the Secure
28 Communications (formerly Cyber) business unit in 2025.)

12. Sustainability functions are now handled by BlackBerry's legal department, which had executives responsible for sustainability functions before Ms. Sandhu took on the role of Vice President, Sustainability. Legal department employees have also been responsible for those functions since Ms. Sandhu's departure.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that I executed this declaration on December 10, 2025 in Waterloo, Ontario, Canada.

DATED: December 10, 2025

Signed by:
Jennifer Bramhill
By: _____ D83072D418F74D9...
Jennifer Bramhill